

Exhibit “4”
Stipulation of Dismissal

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ALLSTATE INSURANCE COMPANY, ET AL.,

-against-

BARAEV, ET AL.,

Plaintiffs,

Defendants.

**24-cv-1823
(AMD)(JAM)**

**STIPULATION AND ORDER
OF VOLUNTARY DISMISSAL
WITH PREJUDICE SOLELY
AS TO APOGEE MULTI
SERVICES INC. AND ADAM
BARAEV**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, as follows:

1. Any and all claims and defenses by and between Allstate Insurance Company, Allstate Fire and Casualty Insurance Company, and Allstate Property and Casualty Insurance Company (collectively “Plaintiffs”), on the one hand, and Apogee Multi Services Inc. and Adam Baraev (“Defendants”), on the other, are hereby voluntarily dismissed, with prejudice, pursuant to Fed. R. Civ. P. 41(a)(2).
2. Plaintiffs and Defendants shall pay their own costs and attorneys’ fees.
3. This Stipulation and Order of Voluntary Dismissal is solely limited to discontinuing claims by and between the parties hereto.

Dated: New York, New York

—June_____, 2024—
September 19, 2024

MANNING & KASS, ELLROD, RAMIREZ, TRESTER LLP

By: /s/ Lee Pinzow

Robert A. Stern, Esq.
James A. McKenney, Esq.
Lee Pinzow, Esq.
100 Wall Street, Suite 700
New York, New York 10005
*Counsel for Plaintiffs Allstate Insurance
Company, Allstate Fire and Casualty
Insurance Company, and Allstate
Property and Casualty Insurance Company*

SCHWARTZ, CONROY & HACK, P.C.

By: 

Matthew J. Conroy, Esq
Robert E. Hewitt, Esq
666 Old Country Road, 9th Fl.
Garden City, New York 11530
*Counsel for Apogee Multi Services Inc.
and Adam Baraev*

SO ORDERED

Ann M. Donnelly, U.S.D.J.

Dated: _____, 2024